

## **EXHIBIT D**

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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ANDREW DELANEY,

Plaintiff,

Case No.

v.

**CONSENT TO REMOVAL**

HC2, INC., STEPHANOS ZANNIKOS, MICHAEL  
JOHN ESKER NACCHIO, and TOYOTA MOTOR  
NORTH AMERICA, INC.

Defendants.

-----X

Defendants HC2, Inc., Stephanos Zannikos, and Michael John Esker Nacchio (“HC2 Defendants”) by and through their undersigned counsel, hereby provide notice that they consent to removal of the civil action captioned *Andrew Delaney v. HC2, Inc., Stephanos Zannikos, Michael John Esker Nacchio, and Toyota Motor North America, Inc.*, Index No. 155158/2024 from the Supreme Court of New York, New York County, to the United States District Court for the Southern District of New York. HC2 Defendants reserve, and do not waive, all rights and defenses, including without limitation, any defenses concerning lack of personal jurisdiction and improper forum or venue.

Dated: New York, New York  
July 10, 2024

Respectfully submitted,

**OGLETREE DEAKINS**

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